

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

JI WANG, and  
ZHIXIANG WANG,

Defendants.

CASE NO. MJ24-169

COMPLAINT for VIOLATIONS

BEFORE Brian A. Tsuchida, United States Magistrate Judge, Seattle, Washington.

**COUNT 1**  
**(Kidnapping)**

On or about May 27-28, 2023, in King County, within the Western District of Washington, and elsewhere, JI WANG and ZHIXIANG WANG did intentionally and unlawfully seize, confine, kidnap, abduct, and carry away a person, that is, Victim 1, and, in committing and in furtherance of the commission of the offense, did travel in interstate commerce and use a facility and instrumentality of interstate commerce, that is, a motor vehicle and cellular telephones.

All in violation of Title 18, United States Code, Sections 1201(a)(1) and 2.

**COUNT 2****(Collection of Extension of Credit by Extortionate Means)**

On or about May 27-28, 2023, in King County, within the Western District of Washington, and elsewhere, JI WANG and ZHIXIANG WANG knowingly participated in the use of extortionate means, that is, the use of violence, and the express and implicit threat of use of violence to cause harm to the person of Victim 1, to collect and attempt to collect an extension of credit and to punish Victim 1 for the nonrepayment thereof.

All in violation of Title 18, United States Code, Sections 894(a)(1) and (2), 891, and 2.

The undersigned, Scott P. Orlinski, complainant being duly sworn states:

I am a Special Agent (SA) with the U.S. Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI), assigned to the Office of the Special Agent in Charge, Seattle, Washington. I have been an agent with HSI since December 2019. HSI is responsible for enforcing the customs and immigration laws and federal criminal statutes of the United States. Since October of 2022, I have been assigned to investigate criminal violations relating to human trafficking. During that time, I have participated in all aspects of human trafficking investigations, including planning and leading operations, surveillance, suspect and victim interviews, executing arrest and search warrants, and reviewing digital forensic evidence.

Prior to my current assignment, I spent three years investigating criminal violations relating to child exploitation and child pornography, including the production, distribution, receipt, and possession of child pornography and material involving the sexual exploitation of minors. I am a graduate of the Federal Law Enforcement Training Center (FLETC), HSI Special Agent Training Program, and have received further specialized training in investigating human trafficking and child exploitation crimes. Before joining HSI, I worked for United States Citizenship and Immigration Services (USCIS) for approximately eleven years in various positions. During my time with USCIS, I spent approximately five years conducting investigations.

1 This affidavit is made based upon my personal knowledge, training, experience,  
2 and investigation, as well as upon information provided to me and my review of reports  
3 prepared by other law enforcement personnel. This affidavit is made for the purpose of  
4 establishing probable cause for this Complaint and thus does not include every fact  
5 known to me concerning this investigation.

6 **SUMMARY OF PROBABLE CAUSE**

7 **A. The Kidnapping of Victim 1.**

8 On May 27, 2023, at 10:04 p.m., several witnesses called 911 to report an incident  
9 occurring outside the Soma Towers in Bellevue, Washington. The callers reported that an  
10 Asian male victim was being forced into a vehicle by two other Asian males and that the  
11 vehicle had just left the area. Bellevue Police Department (BPD) officers responded to  
12 the scene within a few minutes.

13 A BPD officer met with witness BS, who captured part of the incident on video  
14 from his third-floor apartment. BS heard someone screaming, "Help!" or something to  
15 that effect. He looked outside and saw two Asian males assaulting another Asian male.  
16 The suspects then forced the victim into a black SUV and drove away. BS did not know  
17 the suspects or the victim. The video that BS captured showed the suspects lifting the  
18 victim off the ground, each holding onto the victim's arms. The suspects picked the  
19 victim up and forced him into the SUV while the victim struggled, yelled, and made  
20 grunting noises. The suspects eventually forced the victim into the vehicle and drove  
21 away.

22 Another witness, BW, told officers that he also saw the incident from his  
23 apartment. After hearing loud screaming, BW looked outside and saw the victim being  
24 "choked out" by a suspect wearing a white shirt. BW said the victim appeared to be an  
25 employee at an Asian restaurant based on his attire. According to BW, after the suspects  
26 forced the victim into the SUV, the vehicle was shaking as though the physical  
27 altercation continued inside. BW noticed several other individuals standing outside in the  
same attire as the victim.

1 Responding officers contacted this group of people and determined that they  
2 worked with the victim at the Lao Ma Tou Hot Pot restaurant, located on the second floor  
3 of the Soma Towers. Witness ZZ told officers that the victim (hereinafter referred to as  
4 “Victim 1” or “V1”) was working in the restaurant when one of the suspects (later  
5 identified as ZHIXIANG WANG) came inside and asked for V1 by name. The suspect  
6 said he was “a friend” of V1. The employees went into the kitchen to get V1. The suspect  
7 and V1 greeted each other. The suspect put his arm around V1, and they walked outside.  
8 BPD officers later obtained surveillance video from inside the restaurant that depicted  
9 this interaction between V1 and the suspect.

10 Shortly thereafter, ZZ heard V1 yelling, “Help!” and went outside to check on V1.  
11 ZZ saw two suspects grabbing V1’s arms and pinning them behind his back. The suspects  
12 took V1 to the ground on the second-floor balcony and started smashing his face into the  
13 ground. The suspects then stood V1 up and dragged him down the stairs to the ground  
14 level sidewalk, where they pushed him down and again smashed his face into the ground.  
15 ZZ saw V1’s glasses break and fall off his face. The suspects then stood the victim up,  
16 forced him into the backseat of a black SUV, and drove off. ZZ took a photograph of the  
17 back of the vehicle, which identified it as a Mercedes SUV with California temporary  
18 license plate CL72L43.

19 Officers also spoke with MH, who identified herself as V1’s girlfriend. MH was  
20 not present at the time V1 was kidnapped but she responded to the area after being  
21 contacted by the owner of the restaurant. MH told officers that she had been  
22 communicating with V1 over WeChat.<sup>1</sup> According to MH, V1 was responding with short  
23 text messages including one explaining that he owed the suspects money, and they were  
24 just out for a drive having a “friendly chat” regarding the debt. The rest of the responses  
25 were delayed and were along the lines of: “I’m fine”; “I’ll be home soon”; and “Tell the  
26 cops to leave.” MH attempted to call V1’s cell phone several times but it went straight to  
27 voicemail.

<sup>1</sup> WeChat is a Chinese instant messaging, social media, and mobile payment application.

1 One of the officers suggested that MH request a video call to V1's WeChat  
2 profile. She did so and the call was answered by one of the suspects (later identified as  
3 JI WANG). The BPD officer used his cell phone to record the video call occurring over  
4 MH's phone.

5 V1 could be seen slumped over in the front passenger seat of a vehicle with his  
6 eyes closed. At one point, he woke up and vomited into a bucket. Ji Wang stated words to  
7 the effect, "We are fine, he's going to be back at the restaurant soon." The BPD officer  
8 told the suspect to turn the phone towards himself. The suspect did so and showed his  
9 face on the video (as discussed in greater detail below). Witness ZZ was watching the  
10 video call and identified the suspect as one of V1's kidnappers and assailants with  
11 absolute certainty. The officer asked Ji Wang whether he had done anything to make V1  
12 sick. Ji Wang replied that V1 was "just car sick." The officer asked whether Ji Wang  
13 would tell him the location of the vehicle or pull over to wait for the police to arrive, but  
14 Ji Wang declined.

15 The officer then asked Ji Wang why he took V1 from the restaurant. Ji Wang  
16 replied, "He owes me money." He then turned the camera back to V1 and said, "Tell the  
17 officer how much you owe me!" V1 was nonresponsive and groaned in pain. Ji Wang  
18 then stated, "700 dollars, right?" V1 grunted in response. Ji Wang again stated that V1  
19 would be back at the restaurant soon and then ended the call. MH made attempts to  
20 initiate another video call but got no answer.

21 MH told officers that a friend of hers who lives in Los Angeles, FL, was also in  
22 touch with the suspects through V1's WeChat profile. MH said the suspects seemed more  
23 responsive to FL. At approximately 1:00 a.m., MH was contacted by FL. According to  
24 FL, he had just spoken to V1 over WeChat. FL stated that the suspects had dropped off  
25 V1 somewhere in Bellevue and he was by himself. FL further stated that V1 sounded  
26 disoriented and did not know where he was.

27 At approximately 2:05 a.m., an employee at a Chevron gas station in Bellevue  
called 911 to report that an adult Asian male entered the business and appeared to have  
been assaulted. BPD officers responded and identified the Asian male as V1. V1 was

1 verbally unresponsive and had injuries to the head and face consistent with having been  
2 assaulted. V1 was transported to the Overlake Medical Center. Officers took MH to the  
3 hospital where she reunited with V1. Officers made attempts to interview V1 about the  
4 kidnapping, but he was not able to answer questions at that time.

5 V1 was admitted to the Critical Care Unit at Overlake Medical Center, where he  
6 remained for several weeks in critical condition. According to medical personnel, upon  
7 admission V1's condition rapidly declined, and he was placed on a ventilator. V1 had  
8 swelling and bleeding on the brain which was life-threatening and required immediate  
9 surgery. During the surgery, part of V1's skull was removed to allow the swelling to  
10 decrease. He was then admitted to the ICU in a comatose state. Over the next several  
11 weeks, V1 slowly recovered to the point where he could be released from the hospital.

12 **B. Interviews of Victim 1 and his Girlfriend.**

13 Once V1 was able to speak with investigators, he was interviewed on several  
14 occasions. His girlfriend, MH, was also interviewed on multiple occasions. They told  
15 investigators about the circumstances that led to the kidnapping incident.

16 According to V1, he and MH traveled together from China to the United States,  
17 arriving in January 2023. They crossed the U.S./Mexico border illegally and were  
18 arrested by U.S. immigration authorities. They were released from custody and moved to  
19 the Los Angeles area. V1 found work at the Lao Ma Tou Hot Pot restaurant in that area.

20 V1 was contacted by alien smugglers ("snakeheads") who asked him to refer  
21 business to their smuggling operation. V1 knew other people from China who were  
22 looking to be smuggled into the U.S., and he referred them to the alien smugglers in  
23 exchange for a fee of a few hundred dollars per person. V1 was responsible for collecting  
24 the smuggling fees from the people he referred. The alien smugglers told V1 to collect  
25 \$5,000 per person. However, V1 believed the going rate was \$3,000 per person, and that  
26 is what he collected. When he provided the collected fees to the smugglers, they told V1  
27 that he owed them the difference, which was \$7,000.

V1 said he and MH temporarily moved to Bellevue to assist in the opening of a  
new location of the Lao Ma Tou Hot Pot restaurant. V1 did not know how the suspects

1 located him in Bellevue. V1 understood that the kidnapping and assault was an effort to  
2 collect on this debt and punish him for nonpayment. According to V1, he had never met  
3 the two men who kidnapped and assaulted him. V1 said that when he was taken outside  
4 by the suspects, he knew something bad was going to happen. After he was forced into  
5 the SUV, both suspects brandished firearms and pistol-whipped him with the weapons.  
6 V1 further stated that the suspects demanded that he pay the \$7,000 debt.

7 MH confirmed that she and V1 had entered the United States in January 2023 and  
8 that, after being arrested and released, they relocated to the Los Angeles area. She  
9 claimed not to know about the debt owed by V1 and had never met the suspects before.

10 **C. The Defendants' Interstate Travel and Use of Cell Phones.**

11 As noted above, during the kidnapping the suspects used a black Mercedes SUV  
12 with California temporary license plate CL72L43. BPD officers received information  
13 from other police departments and a regional network of traffic cameras which  
14 established that this vehicle was in the greater Los Angeles area from May 2-26, 2023;  
15 then traveled through Tukwila, Washington on May 27 at approximately 6:00 p.m. (a few  
16 hours prior to the kidnapping); and had returned to the Los Angeles area (Monterey Park,  
17 California) by May 31, 2023. Based on this information, I believe that the suspects used  
18 the Mercedes SUV to travel between California and Washington for the purpose of  
19 committing the kidnapping.

20 This travel pattern was confirmed after investigators obtained locator information  
21 for a phone number that was used by the suspects in furtherance of the kidnapping. This  
22 phone number was identified during a forensic examination of V1's cell phone. On the  
23 night of the kidnapping, there were four voice calls (two incoming and two outgoing)  
24 between V1's phone and phone number 818-658-1888 (hereinafter the "1888 number").  
25 The 1888 number also contacted V1's phone on several occasions during the days  
26 leading up to the kidnapping. For example, on May 24, 2023, the 1888 number had a text  
27 message exchange with V1's phone in Mandarin, which is translated below:



1 **V1:** What about you now?

2 **1888 number:** What's the matter with you? Would you pay me back the  
3 money?

4 **V1:** Sir, see you in Dingpangzi next month.<sup>2</sup>

5 **1888 number:** Do you have the courage to send me the location? I am  
6 ready to wait for you at any time! Don't talk nonsense.

7 **V1:** See you in Dingpangzi. I will invite you to drink and chat.

8 **1888 number:** Don't talk nonsense! Make something real.

9  
10 Investigators determined that the 1888 number was serviced by T-Mobile and  
11 obtained a search warrant for location information for the device assigned that phone  
12 number. According to T-Mobile, the device was located in the following places:

- 13 • On May 26, 2023, at 3:39 p.m., at Castaic, CA
- 14 • On May 27, 2023, at 1:25 a.m., near Yreka, CA
- 15 • On May 27, 2023, at 2:18 a.m., near Medford, OR
- 16 • On May 27, 2023, at 7:10 a.m., near Portland, OR
- 17 • On May 27, 2023, at 2:00 p.m., near Auburn, WA
- 18 • On May 27, 2023, at 8:38 p.m., near Bellevue, WA
- 19 • On May 27, 2023, at 8:40 p.m., in Bellevue, WA
- 20 • On May 27, 2023, at 9:02 p.m., in Bellevue, WA
- 21 • On May 27, 2023, at 9:34 p.m., in Seattle, WA
- 22 • On May 27, 2023, at 11:02 p.m., near Auburn, WA
- 23 • On May 30, 2023, at 6:53 p.m. near Rosemead, CA

24 The above location information for the 1888 number corresponds to the known  
25 location of the Mercedes SUV before, during, and after the kidnapping incident. It also  
26 corresponds to the location of V1's phone during the kidnapping (based on emergency  
27 "ping" locator data obtained by BPD).

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26 <sup>2</sup> Dingpangzi appears to be the name of a restaurant located in Monterey Park, California. According to other  
27 investigators, this restaurant is known within the Chinese community as a place where Chinese immigrants can go to  
find jobs and a place to live.



1 Based on all this information, I believe that the suspects used the 1888 number  
2 prior to the kidnapping to contact and locate V1 and continued to possess the 1888  
3 number during and after the kidnapping. I further believe that the suspects traveled with  
4 the phone between California and Washington for the purpose of committing the  
5 kidnapping.

6 **D. The Identification of Ji Wang.**

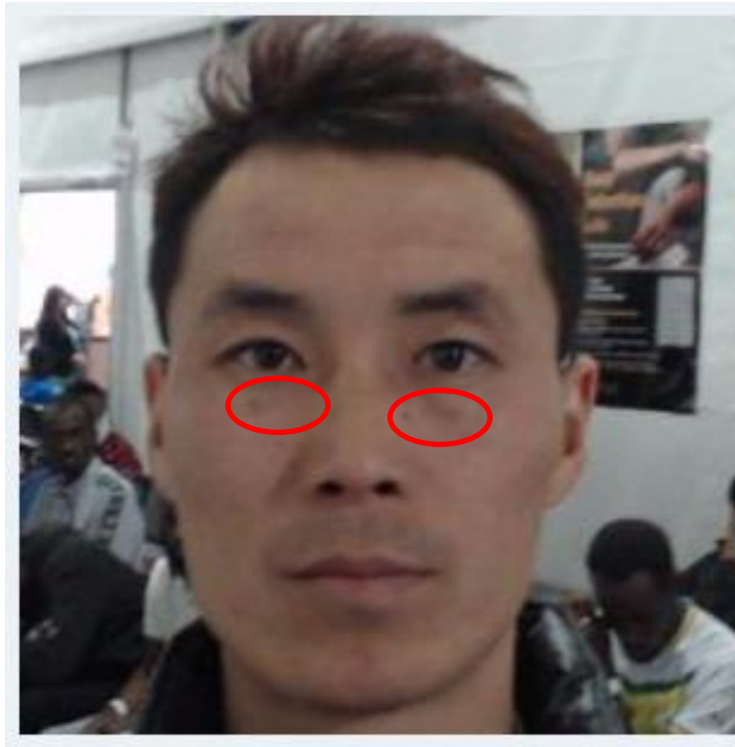
7 **1. Comparison with Prior Photos of Ji Wang.**

8 Investigators initially identified Ji Wang as one of the suspects by using images  
9 from the WeChat video call with MH during the kidnapping. BPD officers took  
10 screenshots of the suspect and submitted them to HSI to run through databases that  
11 conduct facial recognition comparisons with photographs of prior visa applicants. This  
12 query resulted in a match to Ji Wang. Specifically, the system found a match between the  
13 screenshots of the suspect and the below photograph (Figure 1) submitted with Ji Wang's  
14 visa application in April 2015. The photo shows what appears to be a mole on Ji Wang's  
15 left cheek.



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27 **Figure 1**

1 After identifying Ji Wang, HSI officers determined that he had been arrested  
2 entering the United States illegally on May 13, 2023, and was processed at a Border  
3 Patrol Processing Center near Yuma, Arizona. The below photograph (Figure 2) was  
4 taken of Ji Wang at that time. The photo shows what appear to be two moles on his face,  
5 including on his left cheek.



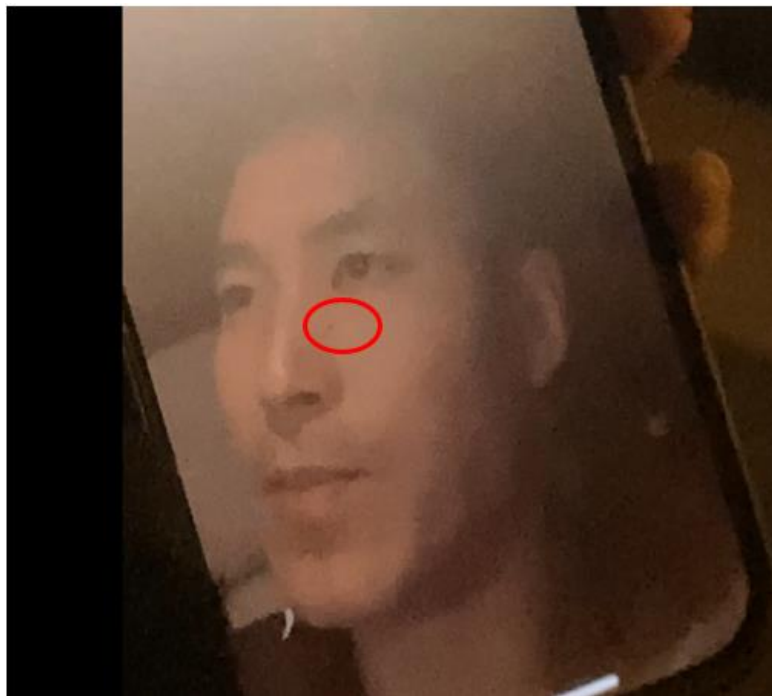
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17 **Figure 2**

18 Investigators found another photograph of Ji Wang stored on his cell phone (as  
19 described below), which contained an image of his recently issued Chinese passport  
20 (Figure 3 below).  
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**Figure 3**

The kidnapping suspect depicted in the video screenshots (Figure 4 and Figure 5 below) appears to match the photographs of Ji Wang, with uniquely sharp facial features and a matching mole on his left cheek. The suspect also appears to have crooked lower teeth with several teeth missing.



**Figure 4**

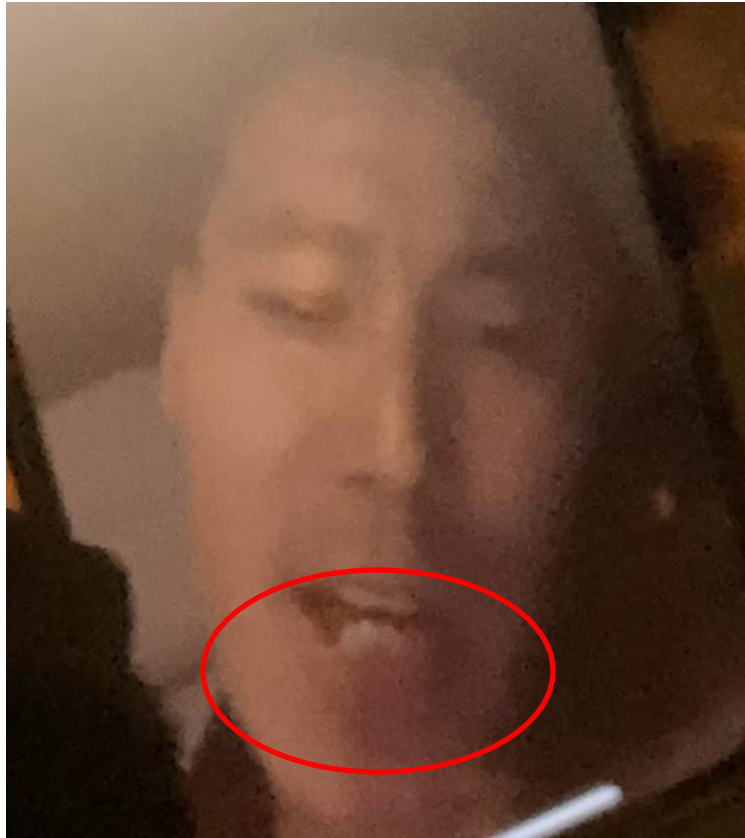


Figure 5

## 2. The Arrest and Interview of Ji Wang.

Based on this information, BPD officers obtained a law enforcement probable cause arrest warrant with nationwide extradition for Ji Wang and entered it into the NCIC system. On June 7, 2023, Ji Wang was arrested in the Los Angeles area by the U.S. Marshal's Service Task Force. The arresting officers seized a cell phone from his person.

On June 10, 2023, BPD officers traveled to Los Angeles, California to interview Ji Wang at the jail where he was being held. One of the BPD officers is a native Mandarin speaker and spoke to Ji Wang in Mandarin. The officer explained that they wanted to speak with him about an incident that occurred in Bellevue, Washington. Ji Wang denied knowing where that was. The officer explained that Bellevue was near Seattle, and stated that Ji Wang did, in fact, know where that was. Ji Wang replied that he wanted to speak to a friend to see if they would get him a lawyer. After some further discussion, Ji Wang confirmed that he wanted to speak to a lawyer, and the officers terminated the interview.

1 After the interview, the BPD officer listened again to the voice of the suspect on  
2 the WeChat video call and confirmed that it matched Ji Wang's voice during the  
3 interview.

4 BPD officers later obtained a search warrant for the cell phone seized from  
5 Ji Wang. A forensic examination revealed that there was very little data on the phone. All  
6 the photos and videos stored on the phone had been modified on or after May 31, 2023  
7 (the same day the Mercedes and the 1888 phone had returned to the Los Angeles area),  
8 and all geolocation information was from the Los Angeles area between June 1-7, 2023.  
9 Based on my training and experience, it is possible that Ji Wang used a different phone  
10 during the kidnapping and/or deleted the data off his phone after the kidnapping.  
11 Criminals often utilize one or more of these tactics to conceal criminal activity that would  
12 be documented on their cell phones.

### 12 **3. Ji Wang's WeChat Communications.**

13 Ji Wang's identity as one of the kidnapping suspects was further corroborated  
14 through WeChat communications. As noted above, V1's girlfriend, MH, identified LF as  
15 a friend from Los Angeles who had been communicating with the suspects during the  
16 kidnapping incident. The day after the kidnapping, investigators interviewed LF about  
17 those contacts. LF explained that he met V1 and his girlfriend over a WeChat group for  
18 recent Chinese immigrants and befriended them in a "big brother" role. LF was not aware  
19 of the debt owed by V1 until MH contacted him during the kidnapping incident. LF  
20 established contact with one of the suspects (Ji Wang) by sending messages through V1's  
21 WeChat profile. Later, the suspect provided his own WeChat profile and LF contacted  
22 him there. During the kidnapping, LF got updates on what was happening from the  
23 suspect and relayed that information to MH.

24 On August 23, 2023, BPD officers met with V1 and MH at Overlake Medical  
25 Center. MH showed officers screenshots of a series of WeChat messages between LF and  
26 Ji Wang. LF engaged in these communications with Ji Wang after the kidnapping and  
27 forwarded the screenshots to MH. The communications were in Mandarin and officers  
had them translated. The most relevant parts of the discussion were:

- 1 • Ji Wang confirmed that he was in Los Angeles.
- 2 • LF stated: “You guys are really going too far, beating someone so badly
- 3 that he still hasn’t regained consciousness.” Ji Wang replied, “I didn’t even
- 4 get out of the car.”
- 5 • LF stated: “You have the choice to either be a witness or a suspect.”
- 6 • Ji Wang said the second suspect went by the nickname “Xiaopqiang” and
- 7 “ha[d] already gone back to China long ago.”
- 8 • LF asked for Ji Wang’s actual name (as opposed to his WeChat profile
- 9 name) but Ji Wang did not provide it.
- 10 • At no time did Ji Wang deny knowledge of or involvement in the
- 11 kidnapping.

12 MH also showed officers a screenshot of a monetary transfer from her WeChat  
13 account to the account used by the suspect who was communicating with LF (Ji Wang).  
14 MH explained that WeChat does not require users to list their real name as their profile  
15 name. However, to conduct money transfers over WeChat, users *are* required to provide  
16 their real name. During a transaction, part of the user’s name is displayed to the other  
17 party to the transaction. Knowing this, MH transferred one dollar to the suspect’s account  
18 to see what would be revealed about his name. The partial name of the suspect was the  
19 Chinese character for “Ji,” the same character appearing on Ji Wang’s passport (see  
20 Figure 6 below).





Figure 6



**E. Identification of Zhixiang Wang.**

**1. The Police Contact with Zhixiang Wang in the Mercedes SUV.**

When BPD officers entered the arrest warrant for Ji Wang into the NCIC system, they also entered a BOLO for the suspect Mercedes vehicle. BPD requested that the Mercedes be located and detained pending application for a search warrant.

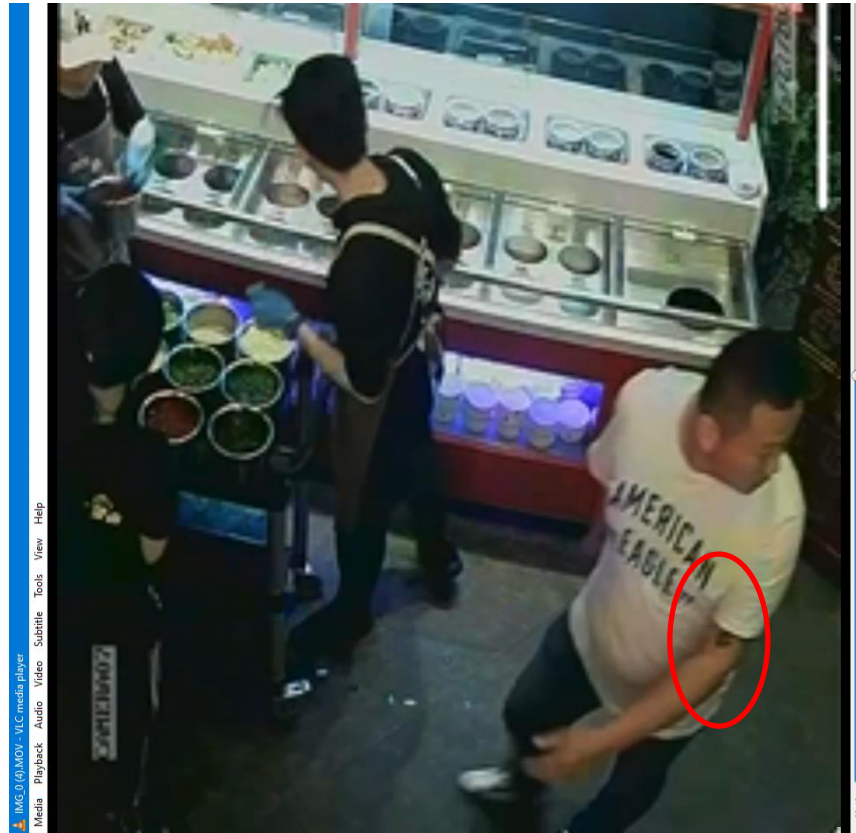
On June 7, 2023, Los Angeles County Sheriff's Department (LACSD) deputies located the Mercedes, which was then displaying a permanent California license plate of 9FCX397. The vehicle was occupied by one individual who was driving, defendant Zhixiang Wang. Zhixiang Wang was photographed (Figure 7) and released, and the deputies seized the vehicle.



**Figure 7**

BPD officers compared the LACSD photographs of Zhixiang Wang with the surveillance video images of the suspect who entered the Lao Ma Tou Hot Pot on March 27, 2023. The suspect in the video (Figure 8 below) was wearing a white T-shirt with the words “American Eagle” on the front. Zhixiang Wang’s physical appearance, in

terms of height, weight, and hairline, matches the suspect. Moreover, the distinctive black and white sneakers Zhixiang Wang was wearing when photographed by the LASCD appear to match the sneakers worn by the suspect in the video. The suspect also appears to have a tattoo on his upper left arm.



**Figure 8**

BPD officers later obtained a search warrant for the Mercedes SUV. There was dried blood on the back of the front passenger seat headrest; this blood was a DNA match for V1. There were also latent fingerprints lifted from the interior of the vehicle that matched Zhixiang Wang's fingerprints. Officers found the temporary California license plate CL72L43 in the glove compartment of the vehicle, along with immigration and other paperwork in various names (not Zhixiang Wang or Ji Wang).

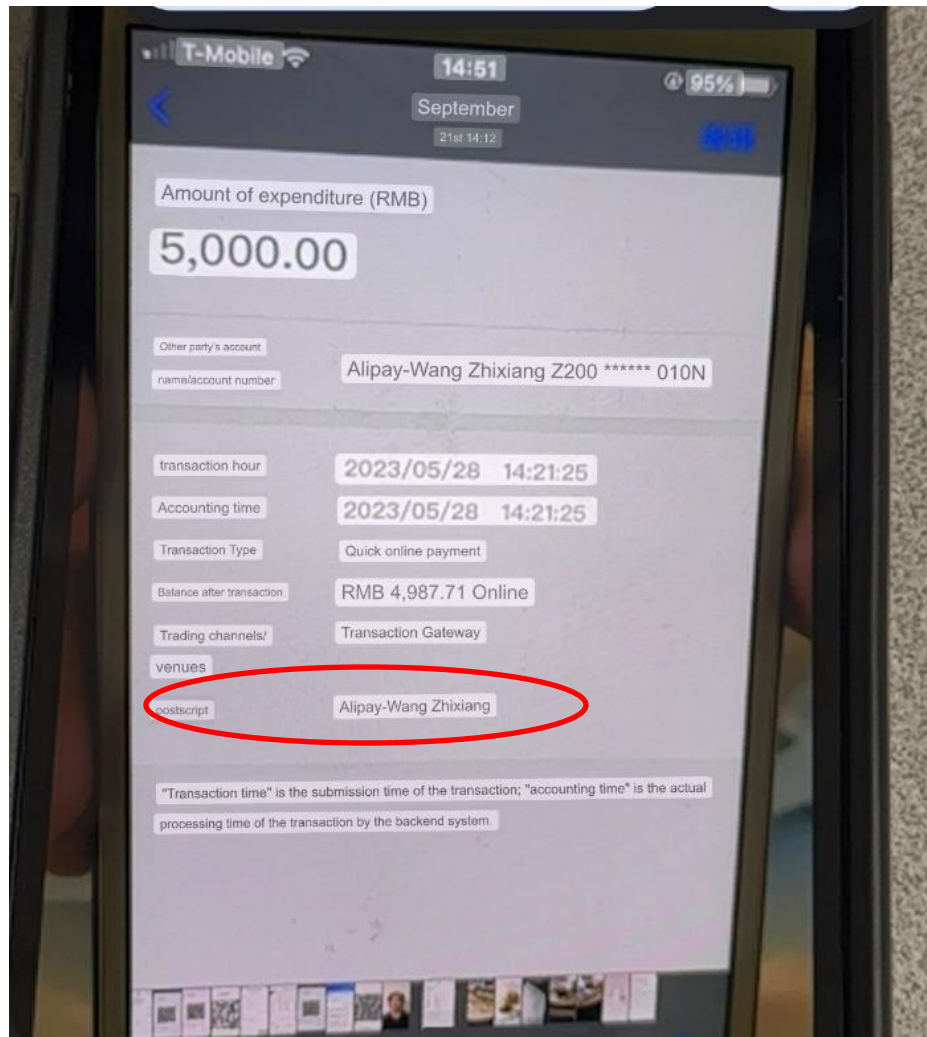
## **2. The Financial Transaction Identifying Zhixiang Wang.**

During a subsequent interview with V1 on September 28, 2023, V1 provided additional information corroborating that Zhixiang Wang was one of the kidnapping suspects. Specifically, V1 showed investigators a financial transaction record on his cell

phone. The transaction involved the transfer of 5,000 RMB (Chinese currency) from one of V1's financial accounts to another account over the Alipay app (a Chinese version of PayPal). The transfer took place during the kidnapping incident. V1 said he did not recall conducting the transaction and believed that the suspects made the transfer using his phone during the kidnapping (his phone does not have an access passcode). Photographs of the original (Chinese) and translated transfer record are below in Figures 9 and 10.



**Figure 9**



**Figure 10**

As reflected in the transaction record, the name associated with the recipient account is “Wang Zhixiang.” The times listed on the record are in Beijing time, because Alipay is a Chinese app. These times correspond to 11:21 p.m. Pacific time, which was in the middle of the kidnapping incident.

**F. Photo Montage Identifications by Victim 1 and Other Witnesses.**

As noted above, BPD officers interviewed several employees at the Lao Ma Tou Hot Pot restaurant on the night of the kidnapping. Subsequently, officers showed three of these witnesses a photo montage which included Ji Wang’s photograph. Witness ZZ identified Ji Wang’s photograph as one of the suspects with a 70% confidence. The other two witnesses were not able to identify a suspect from the montage.

1 On August 23, 2023, officers showed V1 two photo montages containing Ji  
2 Wang's and Zhixiang Wang's photos, respectively. V1 identified Ji Wang's photo as one  
3 of the suspects with a 60% confidence. V1 was unable to pick anyone from the montage  
4 including Zhixiang Wang's photo. V1 explained that he could not make a further  
5 identification because it was dark out at the time of the kidnapping, and he suffered a  
6 head injury during the attack.

7 On October 5, 2023, HSI and BPD again met with V1 and showed him two photo  
8 montages containing Ji Wang's and Zhixiang Wang's photos, respectively. V1 selected  
9 an image from the first montage other than Ji Wang; V1 indicated that he recognized the  
10 person but was unable to positively identify him as one of the suspects. V1 selected two  
11 images from the second montage, neither being Zhixiang Wang; V1 indicated that he  
12 recognized these people but was unable to positively identify them as one of the suspects.

13 //

14 //



CONCLUSION

Based on the foregoing facts, I respectfully submit that there is probable cause to believe that Ji Wang and Zhixiang Wang committed the offenses listed in this Complaint.



SCOTT P. ORLINSKI, Complainant  
Special Agent, HSI

The above agent provided a sworn statement attesting to the truth of the contents of the foregoing affidavit. Based on the Complaint and the sworn statement, the Court hereby finds that there is probable cause to believe the Defendants committed the offenses set forth in the Complaint.

Dated this 19<sup>th</sup> day of March, 2024.



The Honorable Brian A. Tsuchida  
United States Magistrate Judge